

16

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

05-70840

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 03-80810

v.

Honorable Gerald E. Rosen

D-1 AHMAD MUSA JEBRIL,  
D-2 MUSA ABDALLAH JEBRIL,

Defendants.

FILED  
76 APR 19 2005  
U.S. DIST. COURT  
EAST DIST. MICH.  
DETROIT-PC

PETITIONER, SUBHIEH JEBRIL'S MOTION FOR SUMMARY JUDGMENT

NOW COMES Petitioner, Subhieh Jebri, by and through her attorney, Jorin G. Rubin, Esq. for her Motion for Summary Judgment, pursuant to Federal Rule of Civil Procedure 56. In support of its Motion, Petitioner relies upon the attached Brief, exhibits and Fed.R.Civ.P 56.

Petitioner sought concurrence in the relief sought for this Motion from the United States and concurrence was denied. Therefore, a hearing on Petitioner's Motion for Summary Judgment will be held before the Honorable Gerald E. Rosen in his courtroom in the U.S. District Court, in the City of Detroit, State of Michigan, at a date and time to be set by the Court.

Respectfully submitted,



Jorin G. Rubin (P60867)  
Law Office of Jorin G. Rubin, PC  
Attorney for Petitioner  
26711 Northwestern Hwy, Suite 200  
Southfield, MI 48034  
(248) 799-9100

Dated: April 17, 2005

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 03-80810

05-70840

v.

Honorable Gerald E. Rosen

D-1 AHMAD MUSA JEBRIL,  
D-2 MUSA ABDALLAH JEBRIL,

Defendants.

PETITIONER, SUBHEIL JEBRIL'S, BRIEF IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
05 APR 19 AM 9:34  
FILED

ISSUES PRESENTED:

I. WHETHER OR NOT SUMMARY JUDGMENT SHOULD BE GRANTED, AS A MATTER OF LAW, IN FAVOR OF PETITIONER, SUBHEIL JEBRIL, BASED ON HER OWNERSHIP INTEREST AS JOINT TENANT BY THE ENTIRETIES WITH DEFENDANT IN REAL PROPERTIES LOCATED AT 4957 ROSALIE, DEARBORN, MICHIGAN, 4909 ROSALIE, DEARBORN, MICHIGAN, 4637 PALMER, DEARBORN, MICHIGAN AND 5745 GREENVIEW, DETROIT, MICHIGAN, PURSUANT TO 21 U.S.C. § 853(n)(6)(A).

II. WHETHER OR NOT SUMMARY JUDGMENT SHOULD BE GRANTED, AS A MATTER OF LAW, IN FAVOR OF PETITIONER, SUBHEIL JEBRIL, BASED ON HER DOWER RIGHTS OF THE REAL PROPERTY LOCATED AT 12000 SANFORD, DETROIT, MICHIGAN, PURSUANT TO 21 U.S.C. § 853(n)(6)(A).

**CONTROLLING AUTHORITY:**

Federal Rule of Civil Procedure 56(c)  
21 U.S.C. § 853(n)  
Federal Rule of Criminal Procedure 32.2(e)  
Michigan Consolidated Law 558.1  
Michigan Consolidated Law 554.43  
Michigan Consolidated Law 554.45

*Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986)  
*Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986)  
*U.S. v. 2525 Leroy Lane*, 910 F.2d 343 (6<sup>th</sup> Cir. 1990), *cert. denied*, 111 S. Ct. 1414 (1991)  
*U.S. v. O'Dell*, 247 F.3d 655, 680 (6<sup>th</sup> Cir. 2001).  
*U.S. v. Duchess Drive*, 863 F. Supp. 492, 501 (6<sup>th</sup> Cir. 1994)  
*Christinas v. U.S.*, 61 F. Supp.2d 642 (6<sup>th</sup> Cir. 1999)

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**LIST OF EXHIBITS**

- A.    Warranty Deed for 4637 Palmer, Dearborn, Michigan
- B.    Quit Claim Deed for 5745 Greenview, Detroit, Michigan
- C.    Warranty Deed for 4957 Rosalie, Dearborn, Michigan
- D.    Warranty Deed for 4909 Rosalie, Dearborn, Michigan
- E.    Land Contract for 12000 Sanford, Detroit, Michigan

## I. INTRODUCTION

Petitioner, Subhieh Jebril is married to the Defendant, Musa Abdullah Jebril, and has been since 1964. During their marriage, the Jebrils purchased certain properties that are held as joint tenants by the entireties. Mr. Jebril also purchased another property during the marriage and Petitioner has a dower interest in that property. Pursuant to 21 U.S.C. § 853(n)(6)(A) and the undisputed facts herein, Petitioner has a legal interest in the subject properties that is superior to the government and therefore prevents forfeiture of those properties.

## II. FACTUAL BACKGROUND

On August 18, 2004, the grand jury handed down the Second Superseding Indictment in this action and sought forfeiture of certain properties (hereinafter the "Indictment"). On November 24, 2004, the jury found the Defendants guilty of all counts and on January 12, 2005, a Preliminary Order of Forfeiture against certain properties was issued.

Subhieh Jebril filed Petitions to Adjudicate the Validity of Her Interest in five of those properties: 4637 Palmer, Dearborn, Michigan; 5745 Greenview, Detroit, Michigan; 4957 Rosalie, Dearborn, Michigan; 4909 Rosalie, Dearborn, Michigan; and 12000 Sanford, Detroit, Michigan (hereinafter the "subject properties."). As set forth below, Petitioner acquired her interest in all of the subject properties before any of the Defendant's criminal conduct occurred.

### **4637 Palmer**

On or about November 25, 1983, Petitioner and her husband purchased the property located at 4637 Palmer, Dearborn, Michigan for \$42,000. They received a warranty deed related to the subject property. A copy of the Warranty Deed is attached hereto as Exhibit A. Only Count One of the Indictment refers to conduct in 2002 related to the Defendant's use of the phone number associated with this property. Indictment ¶13ciii(5).

**5745 Greenview**

On or about March 22, 1990, Petitioner and her husband purchased the property located at 5745 Greenview, Detroit, Michigan for \$25,300. They received a quit claim deed related to the subject property. A copy of the quit claim deed is attached hereto as Exhibit B. There are no allegations in the indictment related to this property.

**4957 Rosalie**

On or about November 9, 1979, Petitioner and her husband purchased the property located at 4957 Rosalie, Dearborn, Michigan for \$15,000. They received a warranty deed related to the subject property. A copy of the warranty deed is attached hereto as Exhibit C. Count 1 contains a reference to this property's address on a subsequent deed unrelated to this property. Counts 13, 18 and 19 contain money laundering allegations related to payments made by Defendants on a mortgage secured by this property in August, September and October 2001.

**4909 Rosalie**

On or about October 18, 1967, Petitioner and her husband purchased the property located at 4909 Rosalie, Dearborn, Michigan and assumed the existing mortgage secured by the property. They received a warranty deed related to the subject property. A copy of the warranty deed is attached hereto as Exhibit D. Counts 13, 18 and 19 contain money laundering allegations related to payments made by Defendants on a mortgage secured by this property in August, September and October 2001.

**12000 Sanford**

On or about March 29, 1991, Petitioner's husband purchased the property located at 12000 Sanford, Detroit, Michigan on a land contract. A copy of the land contract is attached hereto as Exhibit E. Counts 12, 24 and 30 contain money laundering allegations related to

payments made by Defendants to Daniel Buffa, the land contract vendor in July, October and November 2001.

All of the Defendant's criminal conduct alleged in the Indictment and related to the subject properties occurred in 2001 and later. Moreover, no allegations were made regarding criminal conduct and 5745 Greenview. Petitioner acquired her interest in the subject properties before any of the Defendant's conduct described in the Indictment occurred. Therefore, since Petitioner has an interest in the subject properties that is superior to the Defendant's, none of the subject properties can be forfeited to the government.

### **III. ARGUMENT**

#### **SUMMARY JUDGMENT IN FAVOR OF PETITIONER SHOULD BE GRANTED AS A MATTER OF LAW**

##### **A. STANDARD OF REVIEW**

Rule 56(c) of the Federal Rules of Civil Procedure provides that summary judgment shall be rendered if there is "no genuine issues as to any material fact and that the moving party is entitled to a judgment as a matter of law." *Id.* Summary judgment is appropriate if the moving party demonstrates that there is no genuine issue of material fact regarding the existence of an essential element of the nonmoving party's case on which the nonmoving party would bear the burden of proof at trial. *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986); *Martin v. Ohio Turnpike Comm'n*, 968 F.2d 606, 608 (6<sup>th</sup> Cir. 1992). A fact is "material" for purposes of summary judgment if proof of that fact would have the effect of establishing or refuting an essential element of the cause of action or a defense advanced by the parties. *See Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986); *Kendall v. Hoover Co.*, 751 F.2d 171, 174 (6<sup>th</sup> Cir. 1984). Once the moving party has carried its initial burden of demonstrating that there are

no issues of material facts in dispute, the burden shifts to the nonmoving party to present specific facts to prove that there is a genuine issue for trial. *See Anderson*, 447 U.S. at 256.

Consequently, the nonmoving party must do more than raise some doubt as to the existence of a fact, it must produce evidence that would be sufficient to require submission of the issue to the jury. *Anderson*, 447 U.S. at 252.

**B. PETITIONER HAS A LEGAL INTEREST IN THE SUBJECT PROPERTIES SUPERIOR TO DEFENDANT'S RIGHTS**

Criminal forfeiture is *in personum* and only entitles the government to forfeit the convicted defendant's interest in the property, and nothing more. *See U.S. v. O'Dell*, 247 F.3d 655, 680 (6<sup>th</sup> Cir. 2001). The ancillary proceeding is commenced after the Court issues an Order of Forfeiture against the Defendant's interest, to adjudicate the rights of the third parties. *See* 21 U.S.C. § 853(n); R32.2(a). In the ancillary proceeding, if an individual has a "legal interest" in the property to be forfeited, then he/she may file a petition with the court to adjudicate the validity of his/her interest in the property. 21 U.S.C. § 853(n)(2)-(6). There are two standards used to evaluate the Petitioner's interest in an asset based on when the petitioner acquired his/her interest relative to the commission of the crime. If the petitioner acquired his/her interest prior to the time the crime was committed, then the petitioner must be found to have a "legal right, title or interest in the property" superior to the defendant's right (§853(n)(6)(A)). If the petitioner acquires his/her interest subsequent to the commission of the crime then petitioner must be found to be a "bona fide purchaser for value" of the asset after the crime and was without reason to believe that the property was subject to forfeiture (§853(n)(6)(B)).

Here, Petitioner acquired her interest in all of the subject properties before the Defendant's crimes related to those properties were committed (2001 and 2002). Therefore, pursuant to 21 U.S.C. § 853(n)(6)(A), as set forth below, Petitioner's legal interest in the

property, as a matter of law, is superior to the Defendant's and the subject properties cannot be forfeited to the United States.

**1. Property Owned by Petitioner as a Joint Tenants by the Entireties Cannot be Forfeited to the United States**

The controlling case in the Sixth Circuit regarding forfeiture of a non-defendant spouse's interest in real property held as tenants by the entireties is *U.S. v. 2525 Leroy Lane*, 910 F.2d 343 (6<sup>th</sup> Cir. 1990), *cert. denied*, 111 S. Ct. 1414 (1991). In *Leroy Lane*, the government sought civil and criminal forfeiture of real property owned by the Defendant and his wife as tenants by the entireties. *Id.* The defendant's wife filed a petition in the criminal forfeiture ancillary proceeding and a claim in the civil action because she had an interest in the home as a tenant by the entirety. *Id.* at p. 353.

The federal courts must refer to state law to determine the extent of a third party's ownership of the property. *Id.* at p. 347-48; *see also*, *U.S. v. O'Dell*, 247 F.3d 655, 680 (6<sup>th</sup> Cir. 2001). The court in *Leroy Lane* held that the non-defendant wife had an interest in the property, as a joint tenant by the entireties, that was an indivisible one half interest in the property, pursuant to state law, MCL 554.43 and 554.45. Further, that unless one spouse dies, the parties divorce, or, the parties jointly convey the property, the property could not be divided. *Leroy Lane* at pp. 346-48. Applying the state law definition the non-defendant wife's property interest, the Sixth Circuit concluded that the government could not forfeit the marital home that was owned as tenants by the entireties, because the Defendant's wife had a legal indivisible interest, under 21 U.S.C. § 853(n)(6), that was vested in, and superior to, the Defendant's. *Id.*

The court's holding in *Leroy Lane* has been followed in both criminal and civil forfeiture proceedings. *See U.S. v. Duchess Drive*, 863 F. Supp. 492, 501 (6<sup>th</sup> Cir. 1994) (civil forfeiture impermissible if property owned by innocent spouse as tenants by the entireties); *Christinas v.*



*U.S.*, 61 F. Supp.2d 642 (6<sup>th</sup> Cir. 1999) (criminal forfeiture against property owned as tenants by the entirety was invalid). *See also*, *U.S. v. Craft*, 535 U.S. 274 (2002) (the Court applied Michigan state law and held that a federal tax lien against property owned as tenants by the entirety due to husband's tax problems could not be attached to satisfy the lien). Other federal circuits have prevented forfeiture of property held as tenants by the entirety. *See U.S. v. One Single Family Residence*, 894 F.2d 1551, 1516 (11<sup>th</sup> Cir. 1990) (under Florida law, property owned as joint tenants by the entirety could not be forfeited because the spouse's interest encompasses the entire property).

Petitioner, here, acquired her interest in all the subject properties 4957 Rosalie, 4909 Rosalie, 4637 Palmer, and 5745 Greenview before Defendant's criminal conduct was alleged to have occurred. This fact is not in dispute. Petitioner acquired her interest in the properties as a tenant by the entirety: 4957 Rosalie - in 1979, 4909 Rosalie - in 1967, 4637 Palmer - in 1983, and 5745 Greenview - in 1990. Further, it is not disputed that none of the criminal conduct tangentially related to any of the subject properties occurred in 2001 and 2002.

Therefore, pursuant to 21 U.S.C. § 853(n)(6)(A), Petitioner has a legal interest as a tenant by the entirety that is superior to that of the Defendant and therefore, summary judgment, as a matter of law, in her favor should be granted.

## **2. Petitioner's Dower Interest in Property Prevents its Forfeiture**

Petitioner has a dower interest in any property owned by her husband, MCL 558.1. The issue is whether or not a Petitioner's dower interest in her husband's property is sufficient to give her a "legal interest" to contest the forfeiture of real property. Although there are no Michigan forfeiture cases that discuss dower rights, one civil forfeiture Massachusetts case addressed the affect of dower on forfeiture. That court held that if the wife acquired her interest in the property

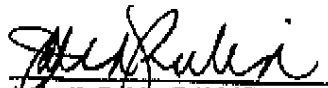
through Massachusetts dower laws, she was an "innocent owner" within the meaning of the civil forfeiture statute (21 U.S.C. § 881), even if she acquired her interest after the crime was committed. *See U.S. v. 221 Dana Avenue*, 261 F.3d 65 (1<sup>st</sup> Cir. 2001). Such application of the dower laws should be applied to this action.

Here, Mr. Jebriel purchased the property located at 12000 Sanford during his marriage to Petitioner in 1991. While Petitioner's name is not on the title, it is undisputed that she has an inchoate dower right to this property, under Michigan law. The Indictment does not allege criminal conduct related to the Sanford property before 2001. Since federal court looks to state law to adjudicate property ownership interests, pursuant to 21 U.S.C. § 853(n)(6)(A), Petitioner has a legal interest through her dower rights that is superior to that of the Defendant and therefore, summary judgment, as a matter of law, in her favor should be granted.

#### IV. CONCLUSION

For the reasons stated above, Petitioner respectfully requests that her Motion for Summary Judgment be granted.

Respectfully submitted,



Jorin G. Rubin (P60867)  
Law Office of Jorin G. Rubin, PC  
Attorney for Petitioner  
26711 Northwestern Hwy, Suite 200  
Southfield, MI 48034  
(248) 799-9100

Dated: April 18, 2005

**WARRANTY USED  
STATUTORY FORM  
FOR INDIVIDUALS**

710

678023

**LT 21855-20F**

7-8-15453

**KNOW ALL MEN BY THESE PRESENTS:** That John C. Watten and Virginia K. Watten, his wife

where reported and contact address is 7809 Murphy, Howell, Michigan 48843

Convey and Worthall to Musa A. Jabril and Rubinah Jabril, his wife

where first number and words after address: 4304 Bonville, SEASTOWN, Michigan 48134

No. of the and City of Michigan, to-wit:	City	of Dearborn	County of Wayne
---	------	-------------	-----------------

lots 44 and 47, and one-half of the vacated alley adjoining thereto, Cleveland Park Subdivision, according to the plat thereof as recorded in Liber 36, Page 87 of Plats, Wayne County Records.

4637 Fulmar  
Item No. 41-07-116-11-069

For the joint of Forty Two Thousand Dollars and 00/100-----(\$42,000.00)

~~with~~ assessments and restrictions of record, if any

Executed this 15th day of November 1953

**Standard and Standard for performance of**

**Journal not rated:**

[Signature]  
 [Signature]  
 [Signature]

John C. Norton 12.1.7  
John C. Norton

U.S.

Kennedy, Jr. (L.S.)  
VIRGINIA A. WATKINS

STATE OF MICHIGAN

COUNTY OF \_\_\_\_\_ DATE \_\_\_\_\_

The foregoing instrument was acknowledged before me this 25th day of November 1983  
by John E. Harris and Virginia M. Harris, his wife

My Contributions expires WY 1987

County, Wayne State, Michigan

\*Mark (1) receipt date (2) short report number(s) acknowledged (3) date (4) signature of person taking acknowledgment

This is to certify that there are no further claims on the property and that the same is being released to the purchaser of the same for the sum of \$100,000.00.

### ★ Training & Guidance

2257  
DEC. 2, 1963  
R. J. J. J.

1. Identify children of each male parent

[illegible]

Desired by: **Robert M. Carter**  
 Mailing address: **14061 Ford Road**  
**Dearborn, MI 48126**  
**NICHOLAN NATIONAL BANK**  
 (See 2nd column)

After recording income tax

63.00

## Discussion

100

**EXHIBIT**

A

EXHIBIT

B

OFFICIAL COPY  
WITH FULLY  
COMPLETED ALL

90050311 TA-43-234750

24587605

NAME OF PERSON FOR WHOM THIS

Floyd L. Wendel and Patricia Ann Wendel, his wife

Where sold, street and number, city, address

40300 N. Valley Drive, Northville, MI 48167

What is known to

Sam A. Jehril and Michelle Jehril, his wife

Where sold, street and number, city, address

4437 Palmer, Dearborn, MI 48126

The following described property is located in the  
and State of Michigan, to-wit:

City of Detroit, County of Wayne

North 36.5 feet of Lot 65, Annemore's Plat of Taubits Farm  
Subdivision, as recorded in Liber 97, Page 99 of Plats, Wayne  
County Records.

Commonly known as: 4748 Greenview  
Item No. 80801-001  
Ward No. 23

90050311

90 MAR 25 PM 3:25  
OFFICE OF THE CLERK  
OF THE COURT  
OF THE STATE OF MICHIGAN

In the sum of Twenty-Five Thousand Eight Hundred and No/100's---(\$25,800.00)---  
Dated the 22nd day of March 19 90

Witnessed and Signed in presence of

*Charles L. Hargis*  
Charles L. Hargis  
Notary Public  
for the State of Michigan

Signed and Sealed

*Floyd L. Wendel*  
Floyd L. Wendel (L.S.)

*Patricia Ann Wendel*  
Patricia Ann Wendel (L.S.)

STATE OF MICHIGAN  
County of Wayne

*Patricia Ann Wendel*  
Patricia Ann Wendel (L.S.)

The foregoing instrument is a mortgage loaned before me the 22nd day of March 19 90  
by and to Floyd L. Wendel and Patricia Ann Wendel, his wife

Notary Public  
for the State of Michigan  
My Commission Expires 19 90

*Charles L. Hargis*  
Charles L. Hargis  
Notary Public  
for the State of Michigan

(1) my date (2) my date of return to address below (3) my date of return to address below

90  
300  
I hereby certify that the foregoing  
instrument is a true and correct copy  
of the original as the same appears  
from the records of the State of Michigan  
and the County of Wayne

300  
I hereby certify that the foregoing  
instrument is a true and correct copy  
of the original as the same appears  
from the records of the State of Michigan  
and the County of Wayne

Notary Public  
for the State of Michigan  
My Commission Expires 19 90

Notary Public  
for the State of Michigan  
My Commission Expires 19 90

Notary Public  
for the State of Michigan  
My Commission Expires 19 90



**Lauyers Title  
Insurance Corporation**

MOBILE STATE OFFICE  
1729 W. Adams Blvd. Tampa, FL 33604

**Address:** 300 N. 1st St.,  
Tulsa, OK 74103



**THE BIBLE**

## WARRANTY DEED

**2014-15-2015-16**

LI20734#763

There is much to be said for the view that the Government should not be asked to finance a large-scale scheme of public housing. The Government should not be asked to finance a large-scale scheme of public housing. The Government should not be asked to finance a large-scale scheme of public housing.

[illegible]

It is possible to obtain the information in other ways, reported by the Bureau of the Census, in the form of a report.

17 minutes 36 seconds West along an old  
18 minutes 20 seconds East and parallel  
feet from North 2 degrees 2 minutes  
Peak Subdivision 35.0 feet to the place  
Survey, 35.0 feet from North 87 degrees  
with the North line of Glades Avenue 198.63  
to second East along the West line of Cloverleaf  
Survey, along that 10 feet cleared for

**PLATE 4:**

Part of the southwest 1/4 of the southwest 1/4 of Fractional Section 13, Town 2 South, Range 10 East, being more particularly described as beginning at a point on the Westerly line of Cloverdale Park Road Division North 2 degrees 8 minutes 40 seconds West, 260.00 feet from the intersection of the Westerly line of Cloverdale Park Association with the North line of Gilroy Avenue as opened 30.0 feet wide and running thence South 87 degrees 51 minutes 20 seconds West, parallel with the North line of Gilroy Avenue, 108.44 feet; thence North 2 degrees 17 minutes 26 seconds West along an old fence 35.0 feet; thence North 87 degrees 51 minutes 20 seconds East parallel with the North line of Gilroy Avenue, 158.54 feet; thence South 2 degrees 8 minutes 40 seconds East, along the West line of Cloverdale Subdivision, 33.0 feet to the place of beginning, excepting East 18 feet closed for alley purpose.

01-3000-2 2 0 01-3000-2 2 0

20 21 22

**SECRET**

EXHIBIT

D

WARRANTY DEED  
STATUTORY FORM

F203187

L16487-113

KNOW ALL MEN BY THESE PRESENTS, That Southy R. Haymour and Noble (Haymour), his wife

whose address is 4287 Woodward - Dearborn, Michigan

Convey and warrant to Miss A. Joubert and Savannah Joubert, his wife

whose home number and telephone address is 4909 Russell - Dearborn, Michigan  
the following described premises siting in the City of Dearborn County of Wayne and State of Michigan, to-wit:

Lot 308, Cloverdale Park Subdivision of part of Fractional Section 13, Town 4 South, Range 10 East and parts of Platets Claims 52 and 512, North of Michigan Avenue, Dearborn Township, Wayne County, Michigan, as recorded in Liber 34, Page 87 of plats, Wayne County Records.

together with all and singular the tenements, improvements and appurtenances thereto in anywise appertaining, for the sum of

One Dollar (\$1)

and other valuable considerations

subject to encumbrances and restrictions of record, and existing mortgages with Manufacturers National Bank of Detroit, which Grantees assume and agree to pay.

GIVEN this 18th day of October 1967  
Signed in the presence of

Signed by

*Marina Joubert* *Southy R. Haymour*  
MARINA JOUBERT Southy R. Haymour  
*Robert Haymour*  
ROBERT HAYMOUR Noble Haymour

WITNESSE NOV 7-1967  
BERNARD J. TOWNSEND, Register of Deeds  
WAYNE COUNTY 28, MICHIGAN

STATE OF MICHIGAN  
County of Wayne

On this 18th day of October 1967 before me personally appeared Southy R. Haymour and Noble Haymour, his wife

to the intent that for the purpose aforesaid they and who assuming the foregoing to be true and acknowledged that they executed the same as their free act and deed.

My Commission expires Nov. 21 1967  
MARINA JOUBERT  
Wayne County, Michigan

This is a copy of the original of the deed as recorded in the public records and may be used for FIVE YEARS from the date of the recording of the deed.

NOV 7 1967

*Paul H. Hurd*  
Paul H. Hurd  
Wayne County, Michigan



When recorded return to:  
J. L. L. KADALA  
ATTORNEY AT LAW  
1111 Woodward Avenue  
Detroit, Mich. 48226

Recording Fee: \$ 20  
U.S. Tax Stamp: \$ 20  
This deed is a true and correct copy of the original as recorded in the public records.

J. L. L. KADALA  
ATTORNEY AT LAW  
1111 Woodward Avenue  
Detroit, Mich. 48226

501-74-4612 11 000000 50



Layman's Title Insurance Corporation

01043542

R-2760-91

Form 150 11-78  
PURCHASERS ASSIGNMENT  
OF LAND CONTRACT

For the full consideration of Twenty-One Thousand One Fifty-Two and 00/100 (\$21,152.00)

(See forth entire sales price)

L1250587068

the undersigned, whose address is 17317 Dresden, Detroit, MI 48208

hereby assign(s) to MUSA A. JABRI

whose address is 12000 Sanford, Detroit, MI 48208

a certain land contract dated August 29, 1998

executed between Daniel Buffa a. single man and Lawrence Buffa, a single man as seller and

Barrington Powell, a single man

as Purchaser, for the sale of land

situated in the City of Detroit County of Wayne

and State of Michigan described as

Lot 1, NICHARD CAMPUS SUBDIVISION, as recorded in Liber 51, Page 68, of Plats,

Wayne County Records.

Commonly Known As: 12000 Sanford

and convey(s) and warrant(s) to said assignee(s) the land above described subject to any easements and encumbrances upon the map of the state and a balance owing upon said contract of Twenty-One Thousand Five-Hundred Fifty-Two and 00/100 (\$21,552.29) which the said assignee(s) assume(s) and agree(s) to pay.

Dated: March 29, 1991

Witnesses:

*Thomas J. Brown*  
THOMAS J. BROWN

Signed and Sealed:

*Barrington Powell*  
Barrington Powell

*Marta A. Schwartz*  
MARTA A. SCHWARTZ

STATE OF MICHIGAN

COUNTY OF Macomb

On this 29th day of March

19 91 before me personally

appeared Barrington Powell, a single man

to me known to be the person(s) described in and who executed the foregoing instrument and acknowledged that he executed the same as his free act and deed.

My commission expires February 21, 1994 Notary Public Wayne County in Macomb County, Michigan  
Dated at: East Troy, Wis. Business Address: 24000 Harper, St. Clair Shores, MI 48081

Receipt of a duplicate of this document is hereby acknowledged  
When Recorded Return to: Macomb, MI 48126

TITLE INSURANCE - ABSTRACTS - ESCROWS

TITLE INSURANCE - ABSTRACTS - ESCROWS